

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FARAH JEAN FRANCOIS,

Plaintiff,

v.

VICTORY AUTO GROUP, LLC d/b/a  
VICTORY MITSUBISHI,  
SPARTAN AUTO GROUP, LLC d/b/a  
VICTORY MITSUBISHI,  
STAVROS ORSARIS,  
YESSICA VALLEJO,  
DAVID PEREZ,  
DIANE ARGYROPOULOS, and  
PHILLIP ARGYROPOULOS,

NO. 1:22-CV 4447-JSR

Defendants.

**Notice of Motion for Admission *Pro Hac Vice***

Pursuant to Rule 1.3 of the Local Rules of the United States Court for the Southern District of New York, Ahmad Keshavarz hereby moves this Court for an Order for admission for Andrew M. Milz to practice Pro Hac Vice to appear as counsel for Plaintiff Farah Jean Francois in the above-captioned action.

1. Applicant's residential address:

Andrew M. Milz  
7 Old Trail Road  
Tunkhannock, PA 18657

2. Applicant's office address, telephone number, facsimile number and email address is:

Andrew M. Milz  
Flitter Milz, P.C.  
450 N. Narberth Avenue, Suite 101  
Narberth, PA 19072

Tel: (610) 822-0782  
Fax: (610) 667-0552  
Email: [amilz@consumerslaw.com](mailto:amilz@consumerslaw.com)

3. Mr. Milz is in good standing and eligible to practice in the following states and there are no pending disciplinary proceedings against him in any state or federal court:

- State of New Jersey (2008)
- Commonwealth of Pennsylvania (2008)

4. Mr. Milz has never been convicted of a felony. He has never been suspended, disbarred, or denied admission or readmission by any court. There are no pending disciplinary proceedings against Mr. Milz in any state or federal court.

5. Local counsel's address, telephone number, facsimile number and email address is:

Ahmad Keshavarz  
*Attorney for Plaintiff*  
The Law Office of Ahmad Keshavarz  
16 Court St., 26<sup>th</sup> Floor  
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6. The required fee of \$200 is being submitted together with this motion

Dated: Brooklyn, NY  
October 31, 2024

Respectfully submitted,

*/s/Ahmad Keshavarz*  
Ahmad Keshavarz  
*Attorney for Plaintiff*  
The Law Office of Ahmad Keshavarz

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## CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2024, a copy of the foregoing Motion for Admission *Pro Hac Vice* was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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Dated: Brooklyn, NY  
October 31, 2024

/s/Ahmad Keshavarz  
Ahmad Keshavarz